

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**NEW HIGH-TECH ENTERPRISE  
COMPANY INC.**

*Plaintiff,*

**VS.**

**INTERWORKS UNLIMITED INC.,  
ERIC H. LU AKA ERIC LU, AND  
ZHU HUAN LU AKA ZHU H. LU,**

### *Defendants*

[illegible]

**CASE NO. 4:18-CV-01962**

**STIPULATION FOR DISMISSAL  
WITH PREJUDICE**

The Parties to this action, acting through undersigned counsel, and under Federal Rule of Civil Procedure 41(a)(1)(A)(ii), hereby stipulate, in consideration of a negotiated settlement executed by them (the “Settlement Agreement”), to the dismissal with prejudice of this action, including all claims and counterclaims stated herein against all Parties, with each Party to bear their own attorney’s fees and costs.

IT IS SO STIPULATED.

Dated: May 25, 2021

/s/ Brian M. Gargano  
 Brian M. Gargano  
 NGUYEN & CHEN, LLP  
*Attorneys for Plaintiff and Counterclaim  
 Defendant New High-Tech Enterprise*

Dated: May 25, 2021

/s/ Patrick C. Bates-with permission  
Patrick C. Bates  
MURRAY|LOBB, PLLC

*Attorneys for Defendants and Counterclaim  
Plaintiffs Eric H. Lu and Zhu Huan Lu*

**CERTIFICATE OF SERVICE**

I hereby certify that, on May 25, 2021, a true and correct copy of the above and foregoing was served upon the following parties and/or counsel of record in accordance with Federal Rules of Civil Procedure.

**Via E-Service:**

Patrick C. Bates  
Murray Lobb, PLLC  
700 Gemini, Suite 220  
Houston, Texas 77058  
(281) 488-0630  
(281) 488-2039 Fax

***ATTORNEY FOR DEFENDANTS***

/s/ Brian M. Gargano  
Brian M. Gargano